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Attorney for Defendant, RICARDO GOMEZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 07CR3271-WQH
	)
Plaintiff,	) NOTICE OF MOTION AND
	) MOTION TO:
vs.	)
	) 1) COMPEL FURTHER DISCOVERY; AND
TRACY ANN NELSON (1),	) 2) LEAVE TO FILE FURTHER MOTIONS
RICARDO GOMEZ (2),	)
	) DATE: 5/19/08
Defendants.	) TIME: 2:00 p.m.
	)
	)

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY and  
STEVE MILLER, ASSISTANT UNITED STATES ATTORNEY:

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on **May 19, 2008 at 2:00 p.m.**, or as soon thereafter as  
Counsel may be heard, the Defendant, RICARDO GOMEZ, by and through his counsel, Donald  
A. Nunn, will ask this Court to enter an order granting the motions listed below.

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Notice Of Motion And Motion To: 1) Compel Further Discovery;  
And 2) Leave To File Further Motions

**MOTION**

RICARDO GOMEZ, the Defendant in this case, by and through his attorney, Donald A. Nunn, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery; and
- 2) Leave to file further motions.

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and any and all other matters that may come to this Court's attention prior to or at the time of the hearing on this motion.

Date: April 30, 2008

Respectfully submitted,

s/Donald A. Nunn  
Donald A. Nunn,  
Attorney for Defendant RICARDO GOMEZ

**CERTIFICATE OF SERVICE**

I, Donald A. Nunn declare that:

I am, and was at the time of service of the papers herein referred to, over the age of 18 years and not a party to this action; and I am employed in the County of San Diego, California. My business address is 13426 Community Road. Poway, California.

I caused to be served by electronic mail on April 30, 2008:

**NOTICE OF MOTION AND MOTION TO COMPEL FURTHER  
DISCOVERY AND FOR LEAVE TO FILE FURTHER MOTIONS**

to the following:

- **Elizabeth Barros**  
elizabeth\_barros@fd.org,cori\_cardona@fd.org
- **U S Attorney CR**  
Efile.dkt.gc2@usdoj.gov

s/Donald A. Nunn  
Donald A. Nunn,  
Attorney for Defendant RICARDO GOMEZ